

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 14-30 JRT/SER

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) ALEXANDER EDWARD HEYING,
a/k/a Moose,
a/k/a A-Train;

(2) PETER GREGORY HEYING, and

(3) ACACIA LAUREN RUIZ,
a/k/a Tara Richards,
a/k/a Acacia Sanchez,

Defendants.

INDICTMENT

18 U.S.C. § 1956(h)

18 U.S.C. § 982(a)(1)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 846

21 U.S.C. § 853

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute Marijuana)

From at least as early as in or about 2003 and continuing through on or about
October 15, 2012, in the State and District of Minnesota, the defendants,

ALEXANDER EDWARD HEYING,

a/k/a Moose,

a/k/a A-Train,

PETER GREGORY HEYING, and

ACACIA LAUREN RUIZ,

a/k/a Tara Richards,

a/k/a Acacia Sanchez,

did unlawfully, knowingly and intentionally conspire with each other and with other
persons known and unknown to the Grand Jury, to distribute marijuana, a controlled

SCANNED

FEB 03 2014

U.S. DISTRICT COURT ST. PAUL

substance in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

COUNT 2

(Conspiracy to Commit Money Laundering by Promotion)

From at least as early as November 2004 and continuing through in or about 2011, in the State and District of Minnesota and elsewhere, the defendants,

ALEXANDER EDWARD HEYING,

a/k/a Moose,

a/k/a A-Train,

PETER GREGORY HEYING, and

ACACIA LAUREN RUIZ,

a/k/a Tara Richards,

a/k/a Acacia Sanchez,

knowingly and intentionally conspired and agreed to conduct and attempt to conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity; namely, conspiracy to possess with intent to distribute marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846, knowing that the property involved in the financial transactions represented the proceeds of some form of illegal activity, with the intent to promote the carrying on of such specified unlawful activity, in violation of Title 18 United States Code, Section 1956(a)(1)(A)(i). All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

If convicted of Count 1 of this Indictment, the defendants,

ALEXANDER EDWARD HEYING,

a/k/a Moose,

a/k/a A-Train,

PETER GREGORY HEYING, and

ACACIA LAUREN RUIZ,
a/k/a Tara Richards,
a/k/a Acacia Sanchez,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violation; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation, including but not limited to:

- a. 2451 Robinson Creek Road, Ukiah, California;
- b. 13603 Lake St. Extension, Minnetonka, Minnesota;
- c. 2003 Ford F350 Super Duty Supercab XLT pickup, VIN 1FTSX31P93ED87804;
- d. Colt .45 caliber handgun, serial number 402972 with all associated ammunition and accessories;
- e. Winchester 12 gauge shot gun, serial number 11BMV05540 with all associated ammunition and accessories; and
- f. CZ .308 rifle, serial number SN F5733 with all associated ammunition and accessories.

If convicted of Count 2 of this Indictment, the defendants,

ALEXANDER EDWARD HEYING
a/k/a Moose,
a/k/a A-Train
PETER GREGORY HEYING, and
ACACIA LAUREN RUIZ
a/k/a Tara Richards,
a/k/a Acacia Sanchez

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such violation, and any property traceable to such property, including but not limited to:

a. 2451 Robinson Creek Road, Ukiah, California.

If any of the above-described property is unavailable for forfeiture for any of the reasons set forth in Title 21, United States Code, Section 853(p), the United States shall be entitled to forfeit substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON